

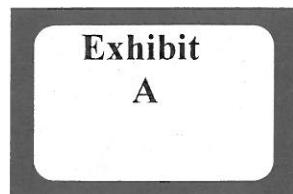
STATE OF MISSOURI)
) SS
 COUNTY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
 STATE OF MISSOURI

Anne Armstrong, Delbert Armstrong,)
 A2D Enterprises, LLC, Beverly Barcus, Kent)
 Barcus, BeverlyRuth, LLC, Dolores Cooney)
 (Formerly Dolores Beidel), Christina Beidel,)
 Women's Fitness of Wausau, Inc., Gail Berquist,)
 GB Fitness, LLC, Carla Birch, Garrison Payne,)
 Racheal Blackmore, One Candle, LLC,)
 Jacqueline Blanton, Phyllis Duhe,)
 Kerrie Chatelain, Hi Heels, LLC, Darlene (Jackie))
 Clary, Dar Jac, LLC, Teresa Collier, Clesta Collins,)
 Roger Collins, Zachary Collins, Tiffany Collins,)
 Denise Cooke, Alan Cooke, Be Strong, LLC,)
 Natalie Cooper-Berthe, Body Design, Inc.,)
 Body Design DC1, Inc., Body Design 2, Inc.,)
 Lee Lynn Lifestyles, LLC, Carol Coy, Jo Lynn)
 Nelson, Amy Draper, AB Draper, LLC,)
 Denise Edmiston, Megan Edwards, Saintfield, LLC,)
 Susan Espy, Glenn Espy, Gypse, LLC,)
 Executive Accounting & Tax Service, Ltd.,)
 Maureen Flanigan Korzinski, Susan Fogg,)
 Rivah Fit Corporation, K&M Fitness, LLC,)
 Matthew Ford, Kristen Stoddard, Diva Deb, Inc.,)
 Debra Freedland, Cathy Frost,)
 Frost Enterprises, Inc., James Gasson, Jr.,)
 Ann Guzdial, John McIntosh, Deedra Haselhuhn,)
 David Haselhuhn, Surfside Fitness, LLC,)
 John Heppe, Kathleen Tomann-Heppe,)
 Dawn Hollenbeck, Jonathan Hollenbeck,)
 Gilpin Avenue Fitness, Inc., Julianne Dugan,)
 Laura Johnson, Bonnilee Jones,)
 Spring Kamp, Spring Kamp, LLC, Ruth Kieffer,)
 B'KLYN Hot Fitness, Inc., Stacey Kopita,)
 Kathleen Loeffler, Jaclynn Loeffler,)
 J&K Health, LLC, John Matusin,)
 Judith McCrary, Beverly McDonald,)
 SEO Group, LLC, Susan O'Donnell, Ana Ogle,)
 Tricia Petrinovich, Stephen Petrinovich,)
 Catherine Pieratt, Fitness Queens, LLC,)

Case Number:

Division:



Steven Price, Helen Price, SH Price, Inc.,)
Keeping You Fit, Inc., Shellene Ragan,)
Deborah Roberts, Faw-Rose Fitness, LLC,)
Gradyne Rose, Daily Kaizen Corp, Christine)
Salomon, Kim Sampson, KSG, LLC,)
Joy Samson, Jacqueline Telles,)
JTS Enterprises, LLC, Tracy Sinclair, Jerome)
Sinclair, Scott Singleton, Lisa Singleton,)
Deborah Spalvins, Stacy Vano,)
Rita Viskup, John Viskup, and Michelle Wicks)
Plaintiffs,)
-vs-)
CURVES INTERNATIONAL, INC.,)
(Serve: Jeff Burchfield)
100 Ritchie Road)
Woodway, TX 76712)
And)
CURVES INTERNATIONAL HOLDINGS, INC.,)
(Serve: NCP – Curves, LLC)
183 East Putnam Ave)
Greenwich, CT 06830)
And)
HOWARD GARY HEAVIN,)
(Serve: 875 County Road 324)
Gatesville, TX 76528)
Defendants.)

Demand for Jury Trial

PETITION FOR DAMAGES

Come now Plaintiffs and for their causes of action against Defendants state as follows:

Introduction

1. Curves International, Inc. was incorporated in the State of Texas in October of 1995 with

its principal place of business in Waco, Texas.

2. Curves International, Inc. began offering Curves/Curves for Women franchises in October of 1995.
3. Curves International, Inc.'s predecessor was Curves for Women Inc., which is a Texas corporation incorporated in August of 1992.
4. Curves for Women, Inc. began the development of procedures and systems which were used to form the foundation of Curves International, Inc.
5. Curves for Women, Inc. owned and operated two aerobic and weight loss centers in Texas from August of 1992 to October of 1995.
6. Curves for Women, Inc. is no longer active.
7. Curves International, Inc. is a franchisor of thirty-minute fitness and weight loss centers to various individuals and businesses using the "Curves for Women" trade name, trademark and system of operating procedures.
8. Curves International, Inc. sells Curves for Women fitness centers, known as Curves, throughout the United States and internationally. To date, Curves has approximately 6,000 franchises worldwide.
9. Curves International Holdings, Inc. is a Texas corporation formed on June 29, 2012 and acquired 100% interest in Curves International, Inc.
10. That Defendant Howard Gary Heavin is the founder of Curves International, Inc. and is a citizen and resident of the State of Texas.
11. That Defendants Curves International, Inc., Curves International Holdings, Inc., and Howard Gary Heavin are hereinafter collectively referred to as "Curves."
12. Curves International, Inc. continues to grant franchises in the fitness and weight loss

industry.

13. All Plaintiffs are and/or were franchisees of Curves.

PARTIES

14. Plaintiffs Anne and Delbert Armstrong are citizens and residents of the State of Alabama. Plaintiffs Anne and Delbert Armstrong executed a franchise agreement with Curves on January 30th, 2013. Plaintiffs Anne and Delbert Armstrong's Curves franchise was located in the Daphne, Alabama area. Plaintiffs Anne and Delbert Armstrong assigned the franchise agreement to Plaintiff, A2D Enterprises, LLC, an Alabama Limited Liability Company. Plaintiff A2D Enterprises, LLC closed its Daphne, Alabama Curves franchise on or around June 27th, 2014.

15. Plaintiff BeverlyRuth, LLC is a California Limited Liability Company. Plaintiff BeverlyRuth, LLC executed a franchise agreement with Curves on May 20th, 2009 by and through Plaintiffs, Beverly Barcus and Kent Barcus. Plaintiff BeverlyRuth, LLC's Curves franchise was located in the Pittsburgh, California area. Plaintiff BeverlyRuth, LLC closed its Pittsburgh, California franchise on or around December 15th, 2012.

16. Plaintiff Dolores Cooney (formerly Dolores Beidel) is a citizen and resident of the State of Nevada. Plaintiff Dolores Cooney's partner, Plaintiff Christina Beidel, is a citizen and resident of the State of Wisconsin. Plaintiff Dolores Cooney executed a franchise agreement with Curves on July 2, 1999 for a Curves franchise located in the Wausau, Wisconsin area. Plaintiff Dolores Cooney assigned the Wausau franchise agreement to Plaintiff, Women's Fitness of Wausau, Inc., a Wisconsin corporation, on December 30th, 2002. That upon information and belief, Plaintiff Women's Fitness of Wausau, Inc. renewed the Wausau franchise agreement in or around July of 2009 and again on

September 11th, 2014. Plaintiff Dolores Cooney executed a franchise agreement with Curves on December 5th, 2001 for a Curves franchise located in the Boulder City, Nevada area. Plaintiff Dolores Cooney assigned the Boulder City franchise agreement to Plaintiff, Women's Fitness of Wausau, Inc., a Wisconsin corporation on December 30th, 2002. That Plaintiff Women's Fitness of Wausau, Inc. closed the Boulder City, Nevada Curves franchise on May 31st, 2012. Plaintiff Dolores Cooney executed a franchise agreement with Curves on November 7th, 2002 for a Curves franchise located in the Las Vegas, Nevada – Enterprise East area. Plaintiff Dolores Cooney assigned the Las Vegas franchise agreement to Plaintiff, Women's Fitness of Wausau, Inc., a Wisconsin corporation on December 30, 2002. Plaintiff Women's Fitness of Wausau, Inc. sold the Las Vegas, Nevada Curves location in October of 2005. Plaintiff Dolores Cooney executed a franchise agreement with Curves in 2003 for a Curves franchise located in the Marathon, Wisconsin area. Plaintiff Dolores Cooney assigned the Marathon, Wisconsin franchise agreement to Plaintiff, Women's Fitness of Wausau, Inc., a Wisconsin corporation.

17. Plaintiff Gail Berquist is a citizen and resident of the State of Florida. Plaintiff Gail Berquist executed a franchise agreement with Curves on January 25th, 2008 for the Golden Gate Estates, Florida area. That upon information and belief, Plaintiff Gail Berquist assigned the Golden Gate Estates, Florida area franchise agreement to Plaintiff, GB Fitness, LLC, a Florida Limited Liability Company. Plaintiff GB Fitness, LLC ceased operation of the Golden Gate Estates, Florida area Curves franchise on or around January 25th, 2013. Plaintiff Gail Berquist executed a franchise agreement with Curves on September 25th, 2009 for the Naples, Florida - Central area. That upon information

and belief, Plaintiff Gail Berquist assigned the Naples, Florida-Central area franchise agreement to Plaintiff, GB Fitness, LLC, a Florida Limited Liability Company. Plaintiff GB Fitness, LLC ceased operations of the Naples, Florida - Central area Curves franchise on or around August 31st, 2014.

18. Plaintiff Carla Birch and Garrison Payne are citizens and residents of the State of Georgia. Plaintiff Carla Birch executed a franchise agreement with Curves on December 19th, 2007. Plaintiff Carla Birch's Curves franchise was located in Warner Robins, Georgia – East area. Plaintiff Carla Birch renewed her franchise agreement on December 19th, 2007. Plaintiff Carla Birch ceased operations of the Warner Robins, Georgia – East area Curves franchise on or around December of 2014.
19. Plaintiff Racheal Blackmore is a citizen and resident of the State of Michigan. Plaintiff Racheal Blackmore executed a franchise agreement with Curves on or around February 26th, 2010. Plaintiff Racheal Blackmore's Curves franchise was located in the Saline, Michigan area. Upon information and belief, Plaintiff Rachel Blackmore assigned the Saline, Michigan area Curves franchise to Plaintiff, One Candle, LLC, a Michigan Limited Liability Company. Plaintiff Racheal Blackmore sold her Saline, Michigan franchise on or around October 12th, 2013. Plaintiff One Candle, LLC executed a franchise agreement with Curves on or around November 22nd, 2011. Plaintiff One Candle, LLC's Curves franchise was located in the Holland, Michigan area. Plaintiff One Candles, LLC ceased operations of the Holland, Michigan area Curves franchise on or around April 1st, 2014.
20. Plaintiff Jacqueline Blanton is a citizen and resident of the State of Texas. Plaintiff Phyllis Duhe is a citizen and resident of the State of Louisiana. Plaintiffs Jacqueline

Blanton and Phyllis Duhe executed a franchise agreement with Curves on or around October 3rd, 2013. Plaintiffs Jacqueline Blanton and Phyllis Duhe's Curves franchise was located in the La Place, Louisiana area. Plaintiffs Jacqueline Blanton and Phyllis Duhe ceased operations of the La Place, Louisiana area Curves franchise on or around December 4th, 2014.

21. Plaintiff Hi Heels, LLC is a Louisiana Limited Liability Company. Plaintiff Hi Heels, LLC executed a franchise agreement with Curves on or around March 4th, 2002. Plaintiff Hi Heels, LLC's Curves franchise was located in the Lafayette, Louisiana – North area. Plaintiff Hi Heels, LLC ceased operations of the Lafayette, Louisiana – North area Curves franchise in March of 2012. Plaintiff Kerrie Chatelain is a citizen and resident of the State of Louisiana. Plaintiff Kerrie Chatelain executed a franchise agreement with Curves on or around March of 2004. Plaintiff Kerrie Chatelain's Curves franchise was located in the Lafayette, Louisiana – South area. Plaintiff Kerrie Chatelain ceased operations of the Lafayette, Louisiana – South area Curves franchise in March of 2014.
22. Plaintiff Darlene (Jackie) Clary is a citizen and resident of the State of New York. Plaintiff Darlene (Jackie) Clary executed a franchise agreement with Curves on or around January 9th, 2012. Plaintiff Darlene (Jackie) Clary's Curves franchise is located in the Camillus, New York area. Upon information and belief, Plaintiff Darlene (Jackie) Clary assigned her franchise agreement to Plaintiff, Dar Jac, LLC, a New York Limited Liability Company.
23. Plaintiff Teresa Collier is a citizen and resident of the State of South Carolina. Plaintiff Teresa Collier executed a franchise agreement with Curves on or around February 10th,

2004. Plaintiff Teresa Collier's Curves franchise was located in the Spartanburg, South Carolina area. Plaintiff Teresa Collier ceased operations of the Spartanburg, South Carolina area Curves franchise on or around December 31st, 2010. Plaintiff Teresa Collier executed a franchise agreement with Curves on or around November 1st, 2004. Plaintiff Teresa Collier's Curves franchise was located in the Spartanburg, South Carolina – West area. Plaintiff Teresa Collier ceased operations of the Spartanburg, South Carolina – West area Curves franchise on or around April 10th, 2014. Plaintiff Teresa Collier executed a franchise agreement with Curves on or around April 14th, 2005. Plaintiff Teresa Collier's Curves franchise was located in the Duncan, South Carolina – East area. Plaintiff Teresa Collier ceased operations of the Duncan, South Carolina – East area Curves franchise on or around April 10th, 2014.

24. Plaintiffs Clesta and Roger Collins are citizens and residents of the State of Texas. Plaintiffs Clesta and Roger Collins executed a franchise agreement with Curves on or around August 6th, 2004. Plaintiffs Clesta and Roger Collins' Curves franchise was located in the Borger, Texas area. Plaintiffs Clesta and Roger Collins sold the Borger, Texas area Curves franchise on or around January 28th, 2013.

25. Plaintiffs Zachary and Tiffany Collins are citizens and residents of the State of Texas. Plaintiffs Zachary and Tiffany Collins executed a franchise agreement with Curves on or around January 30th, 2013. Plaintiffs Zachary and Tiffany Collins' Curves franchise is located in the Borger, Texas area.

26. Plaintiffs Denise Cooke and Alan Cooke are residents and citizens of the State of Missouri. Plaintiff Denise Cooke executed a franchise agreement with Curves on or around June 20th, 2001. Plaintiff Denise Cooke's Curves franchise was located in the

Ellisville, Missouri area. Plaintiff, Be Strong, LLC, a Missouri Limited Liability Corporation, executed a franchise agreement with Curves in 2011. Plaintiff Be Strong, LLC's Curves franchise was located in the Ellisville, Missouri area. Plaintiff Be Strong, LLC ceased operations of the Ellisville, Missouri area Curves franchise on or around June 20th, 2014.

27. Plaintiff Natalie Cooper-Berthe is a citizen and resident of the State of Washington, D.C. Plaintiff Natalie Cooper-Berthe executed a franchise agreement with Curves on or around October 21st, 2002. Plaintiff Natalie Cooper-Berthe's Curves franchise was located in the Washington, DC – Manor/Takoma Park, Maryland area. Plaintiff Natalie Cooper-Berthe assigned the Washington, DC-Manor/Takoma Park, Maryland area Curves franchise agreement to Plaintiff, Body Design, Inc., a Maryland corporation on or around June 10th, 2005. Plaintiff Body Design, Inc. ceased operations of the Washington, DC-Manor/Takoma Park, Maryland area Curves franchise on or around December 31st, 2012. Plaintiff Natalie Cooper-Berthe executed a franchise agreement with Curves on or around October 15th, 2003. Plaintiff Natalie Cooper-Berthe's Curves franchise was located in the Washington, DC-Columbia Heights/Adams Morgan area. Plaintiff Natalie Cooper-Berthe assigned the Washington, DC-Columbia Heights/Adams Morgan area Curves franchise agreement to Plaintiff, Body Design DC1, Inc., a District of Columbia corporation on or around June 10th, 2005. Plaintiff Body Design DC1, Inc. ceased operations of the Washington, DC-Columbia Heights/Adams Morgan area Curves franchise on or around March 31st, 2011. Plaintiff Natalie Cooper-Berthe executed a franchise agreement with Curves on October 14th, 2003. Plaintiff Natalie Cooper-Berthe's Curves franchise was located in the Hyattsville, Maryland area.

Plaintiff Natalie Cooper-Berthe assigned the Hyattsville, Maryland area Curves franchise agreement to Body Design 2, Inc., a Maryland corporation, on or around June 10th, 2005. Plaintiff Body Design 2, Inc. ceased operations of the Hyattsville, Maryland area Curves franchise on or around March 31st, 2011.

28. Plaintiff Lee Lynn Lifestyles, LLC in a Utah Limited Liability Compay. Plaintiff Lee Lynn Lifestyles, LLC executed a franchise agreement on or around June 30th, 2011 by and through Plaintiffs, Carol Coy and Jo Lynn Nelson. Plaintiff Lee Lynn Lifestyles, LLC's Curves franchise is located in the Murray, Utah area. Plaintiff Lee Lynn Lifestyles, LLC executed a franchise agreement on or around August 30th, 2011. Plaintiff Lee Lynn Lifestyles, LLC's Curves franchise was located in the Taylorsville, Utah area. Plaintiff Lee Lynn Lifestyles, LLC gave away its Taylorsville, Utah area Curves franchise in or around January of 2015.

29. Plaintiff Amy Draper is a citizen and resident of the State of Virginia. Plaintiff Amy Draper executed a franchise agreement with Curves on or around April 16th, 2010. Plaintiff Amy Draper's Curves franchise was located in the Aylett, Virginia area. Plaintiff Amy Draper assigned the Aylett, Virginia area Curves franchise to Plaintiff AB Draper, LLC, a Virginia limited liability company, on or around May 25th, 2010. Plaintiff AB Draper, LLC ceased operations of the Aylett, Virginia area Curves franchise on or around January 24th, 2015.

30. Plaintiff Denise Edmiston is a citizen and resident of the State of California. Plaintiff Denise Edmiston executed a franchise agreement on or around January 3rd, 2006. Plaintiff Denise Edmiston's Curves franchise is located in the Idyllwild, California area. Plaintiff Denise Edmiston renewed her Idyllwild, California franchise agreement on or

around December 13th, 2010.

31. Plaintiff Megan Edwards is a citizen and resident of the State of California. Plaintiff Megan Edwards executed a franchise agreement on or around February 28th, 2012. Plaintiff Megan Edwards's Curve franchise was located in the Ojai/Oak View, California area. Plaintiff Megan Edwards assigned the Ojai/Oak View, California area Curves franchise agreement to Plaintiff Saintfield, LLC, a California Limited Liability Company, on or around April 20th, 2012. Plaintiff Saintfield, LLC ceased operations of the Ojai/Oak View, California area Curves franchise on or around August 31st, 2014.
32. Plaintiff Susan Espy is a citizen and resident of the State of California. Plaintiff Susan Espy executed a franchise agreement with Curves on or around May 4th, 2009. Plaintiff Susan Espy's Curves franchise was located in the Antioch, California – West area. Plaintiff Susan Espy assigned the Antioch, California – West area Curves franchise agreement to Plaintiff Gypse, LLC, a California Limited Liability Company, on or around May 18th, 2009. Plaintiff Gypse, LLC ceased operations of the Antioch, California – West area Curves franchise on or around May 3rd, 2014.
33. Plaintiff Executive Accounting & Tax Service, Ltd. is a Ohio Limited Liability Company. Plaintiff Executive Accounting & Tax Service, Ltd. executed a franchise agreement with Curves on or around August 4th, 2010 by and through Plaintiff Maureen Flanigan Korzinski. Plaintiff Executive Accounting & Tax Service, Ltd.'s Curves franchise was location in the Palm Coast, Florida area. Plaintiff Executive Accounting & Tax Service, Ltd. ceased operations of the Palm Coast, Florida area Curves franchise in or around February of 2014.
34. Plaintiff Susan Fogg is a citizen and resident of the State of Virginia. Plaintiff Susan

Fogg executed a franchise agreement with Curves on or around October 19th, 2009.

Plaintiff Susan Fogg's Curves franchise was located in the Tappahannock, Virginia area.

Plaintiff Susan Fogg assigned the Tappahannock, Virginia area Curves franchise agreement to Plaintiff Rivah Fit Corporation, a Virginia corporation, on or around January 14th, 2010. Plaintiff Rivah Fit Corporation ceased operations of the Tappahannock, Virginia area Curves franchise on or around October 18th, 2014.

35. Plaintiff K&M Fitness, LLC is a Utah Limited Liability Company. Plaintiff K&M Fitness, LLC executed a franchise agreement with Curves on or around September 14th, 2011 by and through Plaintiffs Matthew Ford and Kristen Stoddard. Plaintiff K&M Fitness, LLC's Curves franchise is located in the Salt Lake City, Utah – Sugarhouse area.

36. Plaintiff Diva Deb, Inc. is an Illinois corporation. Plaintiff Diva Deb, Inc. executed a franchise agreement with Curves on or around November 2nd, 2011 by and through Plaintiff Debra Freedland. Plaintiff Diva Deb, Inc.'s Curves franchise was located in the Roselle, Illinois area. Plaintiff Diva Deb, Inc. ceased operations of the Roselle, Illinois area Curves franchise on or around February 28th, 2014.

37. Plaintiff Cathy Frost is a citizen and resident of the State of Connecticut. Plaintiff Cathy Frost executed a franchise agreement with Curves on or around September 28th, 2001. Plaintiff Cathy Frost's Curves franchise was located in the East Hartford, Connecticut area. Plaintiff Cathy Frost sold her East Hartford, Connecticut Curves franchise on or around July 1st, 2008. Plaintiff Cathy Frost executed a franchise agreement with Curves on or around May 14th, 2002. Plaintiff Cathy Frost's Curves franchise was located in the Natick, Massachusetts area. Plaintiff Cathy Frost sold her Natick, Massachusetts area

Curves franchise on or around March 14th, 2011. Plaintiff Cathy Frost executed a franchise agreement with Curves on or around December 29th, 2006. Plaintiff Cathy Frost's Curves franchise was located in the Needham, Massachusetts area. Plaintiff Cathy Frost sold her Needham, Massachusetts area Curves franchise on or around August 20th, 2013. Plaintiff Cathy Frost executed a franchise agreement with Curves on or around October 31st, 2001. Plaintiff Cathy Frost's Curves franchise was located in the New London, Connecticut area. Plaintiff Cathy Frost sold her New London, Connecticut area Curves franchise on or around April 10th, 2008. Plaintiff Cathy Frost executed a franchise agreement with Curves on or around May 31st, 2001. Plaintiff Cathy Frost's Curves franchise is located in the Norwich, Connecticut area. Plaintiff Cathy Frost renewed her Norwich, Connecticut area franchise agreement as Plaintiff, Frost Enterprises, Inc., a Connecticut corporation, on or around November 13th, 2012. Plaintiff Frost Enterprises, Inc. ceased operations of the Norwich, Connecticut Curves franchise in or around December 2014.

38. Plaintiff James Gasson, Jr. is a citizen and resident of the State of Virginia. Plaintiff James Gasson, Jr. executed a franchise agreement with Curves on or around October 24, 2002. Plaintiff James Gasson, Jr.'s Curves franchise was located in the Alexandria, Virginia - West area. Plaintiff James Gasson, Jr. ceased operations of the Alexandria, Virginia - West area Curves franchise on or around October 31, 2012. Plaintiff James Gasson, Jr. executed a franchise agreement with Curves on or around April 16th, 2003. Plaintiff James Gasson, Jr.'s Curves franchise was located in the Annadale, Virginia area. Plaintiff James Gasson, Jr. ceased operations of the Annadale, Virginia area Curves franchise on or around November 30th, 2013. Plaintiff James Gasson, Jr.

executed a franchise agreement with Curves on or around September 23rd, 2004.

Plaintiff James Gasson, Jr.'s Curves franchise was located in the Annadale, Virginia – South area. Plaintiff James Gasson, Jr. ceased operations of the Annadale, Virginia – South area Curves franchise on or around March 31st, 2012. Plaintiff James Gasson, Jr. executed a franchise agreement with Curves on or around January 29th, 2004. Plaintiff James Gasson, Jr.'s Curves franchise was located in the Alexandria, Virginia – East area. Plaintiff James Gasson, Jr. ceased operations of his Alexandria, Virginia – East area Curves franchise on or around April 15th, 2011.

39. Plaintiffs Ann Guzdial and John McIntosh are citizens and residents of the State of Michigan. Plaintiffs Ann Guzdial and John McIntosh executed a franchise agreement with Curves on or around June 26th, 2006. Plaintiffs Ann Guzdial and John McIntosh's Curves franchise was located in the West Bloomfield Township/Orchard Lake, Michigan area. Plaintiffs Ann Guzdial and John McIntosh ceased operations of the West Bloomfield Township/Orchard Lake, Michigan area Curves franchise on or around July of 2011.

40. Plaintiffs Deedra and David Haselhuhn are citizens and residents of the State of Michigan. Plaintiffs Deedra and David Haselhuhn executed a franchise agreement with Curves on or around June 2nd, 2011. Plaintiffs Deedra and David Haselhuhn's Curves franchise was located in the Rogers City, Michigan area. Plaintiffs Deedra and David Haselhuhn ceased operations of the Rogers City, Michigan area Curves franchise on or around June 15th, 2014.

41. Plaintiff Surfside Fitness, LLC is a Florida Limited Liability Company. Plaintiff Surfside Fitness, LLC executed a franchise agreement with Curves on or around August

2nd, 2010 by and through Plaintiffs John Heppe and Kathleen Tomann-Heppe. Plaintiff Surfside Fitness, LLC's Curves franchise was located in the Port Saint Lucie, Florida - West area. Plaintiff Surfside Fitness, LLC ceased operations of the Port Saint Lucie, Florida - West area Curves franchise on or around July 26th, 2014.

42. Plaintiffs Dawn and Jonathan Hollenbeck are citizens and residents of the State of Colorado. Plaintiffs Dawn and Jonathan Hollenbeck executed a franchise agreement with Curves on or around March 11th, 2011. Plaintiffs Dawn and Jonathan Hollenbeck's Curves franchise was located in the Chaffee County, Colorado - North area. Plaintiffs Dawn and Jonathan Hollenbeck ceased operations of the Chaffee County, Colorado - North area Curves franchise on or around April 26th, 2013.

43. Plaintiff Gilpin Avenue Fitness, Inc. is a Delaware corporation. Plaintiff Gilpin Avenue Fitness, Inc. executed a franchise agreement with Curves on or around June 28th, 2011 by and through Plaintiffs Julianne Dugan and Laura Johnson. Plaintiff Gilpin Avenue Fitness, Inc.'s Curves franchise was located in the Wilmington, Delaware area. Plaintiff Gilpin Avenue Fitness, Inc. ceased operations of the Wilmington, Delaware area Curves franchise on or around December 31st, 2014. Plaintiff Gilpin Avenue Fitness, Inc. executed a franchise agreement with Curves on or around November 23rd, 2011. Plaintiff Gilpin Avenue Fitness, Inc.'s Curves franchise is located in the Talleyville, Delaware area.

44. Plaintiff Bonnilee Jones is a citizen and resident of the State of California. Plaintiff Bonnilee Jones executed a franchise agreement with Curves on or around January 2nd, 2012. Plaintiff Bonnilee Jones' Curves franchise was located in the Lebac, California area. Plaintiff Bonnilee Jones ceased operations of the Lebac, California area Curves

franchise on or around July 31st, 2014.

45. Plaintiff Spring Kamp is a citizen and resident of the State of Iowa. Plaintiff Spring Kamp executed a franchise agreement with Curves on or around April 30th, 2012. Plaintiff Spring Kamp's Curves franchise was located in the Sheldon, Iowa area. Plaintiff Spring Kamp assigned the Sheldon, Iowa area Curves franchise to Plaintiff, Spring Kamp, LLC, an Iowa limited liability company. Plaintiff Spring Kamp, LLC ceased operations of the Sheldon, Iowa area Curves franchise on or around May 23rd, 2014.

46. Plaintiff Ruth Kieffer is a citizen and resident of the State of Wisconsin. Plaintiff Ruth Kieffer executed a franchise agreement with Curves on or around August 24th, 2004. Plaintiff Ruth Kieffer's Curves franchise was located in the Grand Chute, Wisconsin area. Plaintiff Ruth Kieffer renewed the Grand Chute, Wisconsin area Curves franchise in 2009. Plaintiff Ruth Kieffer ceased operations of the Grand Chute, Wisconsin area Curves franchise on or around August 25th, 2012.

47. Plaintiff B'KLYN Hot Fitness, Inc. is a Florida corporation. Plaintiff B'KLYN Hot Fitness, Inc. executed a franchise agreement with Curves on or around August 3rd, 2009 by and through Plaintiff Stacey Kopita. Plaintiff B'KLYN Hot Fitness, Inc.'s Curves franchise was located in the Oldsmar, Florida area. Plaintiff B'KLYN Hot Fitness, Inc. ceased operations of the Oldsmar, Florida area Curves franchise on or around March 31st, 2014.

48. Plaintiffs Kathleen and Jaclynn Loeffler are citizens and residents of the State of Massachusetts. Plaintiffs Kathleen and Jaclynn Loeffler executed a franchise agreement with Curves on or around August 19th, 2013. Plaintiffs Kathleen and Jaclynn Loeffler's

Curves franchise was located in the Needham, Massachusetts area. Plaintiffs Kathleen and Jaclynn Loeffler assigned the Needham, Massachusetts area Curves franchise agreement to Plaintiff J&K Health, LLC, a Massachusetts limited liability company, on or around November 15th, 2013. Plaintiffs Kathleen and Jaclynn Loeffler ceased operations of the Needham, Massachusetts area Curves franchise in or around January 2015.

49. Plaintiff John Matusin is a citizen and resident of the State of Pennsylvania. Plaintiff John Matusin executed a franchise agreement on or around August 12th, 2002. Plaintiff John Matusin's Curves franchise was located in the city limits of Center, Pennsylvania, within Beaver County, Pennsylvania. Plaintiff John Matusin ceased operations of the Center, Pennsylvania area Curves franchise in or around August of 2012. Plaintiff John Matusin executed a franchise agreement on or around June 16th, 2003. Plaintiff John Matusin's Curves franchise was located in the township limits of Hopewell Township, Pennsylvania, within Beaver County, Pennsylvania and the city limits of Aliquippa, Pennsylvania, within Beaver County, Pennsylvania. Plaintiff John Matusin ceased operations of the Hopewell Township/Aliquippa Curves franchise in or around June of 2013.

50. Plaintiff Judith McCrary is a citizen and resident of the State of Arizona. Plaintiff Judith McCrary executed a franchise agreement with Curves on or around July 28th, 2010. Plaintiff Judith McCrary's Curves franchise was located in the Fairview/Newberry, Pennsylvania area. Plaintiff Judith McCrary ceased operations of the Fairview/Newberry, Pennsylvania area Curves franchise on or around October 18th, 2014.

51. Plaintiff Beverly McDonald is a citizen and resident of the State of Alabama. Plaintiff Beverly McDonald executed a franchise agreement with Curves on September 12th, 2012. Plaintiff Beverly McDonald's Curves franchise was located in the Gulf Shores, Alabama area. Plaintiff Beverly McDonald ceased operations of the Gulf Shores, Alabama area Curves franchise on or around September 26th, 2014.

52. Plaintiff SEO Group, LLC is a Pennsylvania limited liability company. Plaintiff SEO Group, LLC executed a franchise agreement with Curves on or around July 6th, 2009 by and through Plaintiff Susan O'Donnell. Plaintiff SEO Group, LLC's Curves franchise was located in the Newtown, Pennsylvania area. Plaintiff SEO Group, LLC ceased operations of the Newtown, Pennsylvania area Curves franchise on or around January 14th, 2011. Plaintiff SEO Group, LLC executed a franchise agreement with Curves on or around September 29th, 2009. Plaintiff SEO Group, LLC's Curves franchise was located in the Langhorne, Pennsylvania area. Plaintiff SEO Group, LLC ceased operations of the Langhorne, Pennsylvania area Curves franchise on or around September 21st, 2014.

53. Plaintiff Ana Ogle is a citizen and resident of the State of Texas. Plaintiff Ana Ogle executed a franchise agreement with Curves on or around April 27th, 2012. Plaintiff Ana Ogle's Curves franchise was located in the El Paso, Texas – North area. Plaintiff Ana Ogle ceased operations of the El Paso, Texas – North area Curves franchise on or around December 30th, 2013.

54. Plaintiffs Tricia and Stephen Petrinovich are citizens and residents of the State of Washington. Plaintiffs Tricia and Stephen Petrinovich executed a franchise agreement with Curves on or around October 31st, 2003. Plaintiffs Tricia and Stephen

Petrinovich's Curves franchise was located in the Liberty Lake/Otis Orchards, Washington area. Plaintiffs Tricia and Stephen Petrinovich ceased operations of the Liberty Lake/Otis Orchards, Washington area Curves franchise on or around February 28th, 2013.

55. Plaintiff Catherine Pieratt is a citizen and resident of the State of Indiana. Plaintiff Catherine Pieratt executed a franchise agreement with Curves on or around September 26th, 2008. Plaintiff Catherine Pieratt's Curves franchise is located in the North Vernon, Indiana area. Plaintiff Catherine Pieratt renewed her North Vernon, Indiana area Curves franchise under Plaintiff Fitness Queens LLC, an Indiana limited liability company, on or around September 30th, 2013.

56. Plaintiffs Steven and Helen Price are citizens and residents of the State of Pennsylvania. Plaintiffs Steven and Helen Price executed a franchise agreement with Curves on or around August 11th, 2011. Plaintiffs Steven and Helen Price's Curves franchise was located in the Bensalem, Pennsylvania area. Plaintiffs Steven and Helen Price assigned the Bensalem, Pennsylvania area Curves franchise to Plaintiff, SH Price, Inc., a Pennsylvania corporation. Plaintiff SH Price, Inc. ceased operations of the Bensalem, Pennsylvania area Curves franchise on or around July 2nd, 2014.

57. Plaintiff Keeping You Fit, Inc. is a North Dakota corporation. Plaintiff Keeping You Fit, Inc. executed a franchise agreement with Curves on or around October 26th, 2010 by and through Plaintiff Shellene Ragan. Plaintiff Keeping You Fit, Inc.'s Curves franchise was located in the Fargo, North Dakota – North area. Plaintiff Keeping You Fit, Inc. ceased operations of the Fargo, North Dakota – North area Curves franchise on or around June 30th, 2011. Plaintiff Keeping You Fit, Inc. executed a franchise agreement

with Curves on or around October 26th, 2010. Plaintiff Keeping You Fit, Inc.'s Curves franchise was located in the West Fargo, North Dakota area. Plaintiff Keeping You Fit, Inc. ceased operations of the West Fargo, North Dakota area Curves franchise on or around December 9th, 2011. Plaintiff Keeping You Fit, Inc. executed a franchise agreement with Curves on or around October 26th, 2010. Plaintiff Keeping You Fit, Inc.'s Curves franchise is located in the Fargo, North Dakota – South area.

58. Plaintiff Deborah Roberts is a citizen and resident of the State of Massachusetts.

Plaintiff Deborah Roberts executed a franchise agreement with Curves on or around November 3rd, 2011. Plaintiff Deborah Roberts' Curves franchise was located in the Attleboro, Massachusetts area. Plaintiff Deborah Roberts ceased operations of the Attleboro, Massachusetts area Curves franchise on or around November 3rd, 2014.

59. Plaintiff Faw-Rose Fitness, LLC is a North Carolina limited liability company. Plaintiff

Faw-Rose Fitness, LLC executed a franchise agreement with Curves on or around October 28th, 2010 by and through Plaintiff Gradyne Rose. Plaintiff Faw-Rose Fitness, LLC's Curves franchise was located in the Wilkes County, North Carolina – West area. Plaintiff Faw-Rose Fitness, LLC ceased operations of the Wilkes County, North Carolina – West area Curves franchise on or around June 30th, 2011. Plaintiff Faw-Rose Fitness, LLC executed a franchise agreement with Curves on October 28th, 2010.

Plaintiff Faw-Rose Fitness, LLC's Curves franchise was located in the Wilkes County, North Carolina – East area. Plaintiff Faw-Rose Fitness, LLC ceased operations of the Wilkes County, North Carolina – East area Curves franchise on or around July 4th, 2014.

60. Plaintiff Daily Kaizen Corp. is a California corporation. Plaintiff Daily Kaizen Corp.

executed a franchise agreement with Curves on or around August 27th, 2009 by and